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20 Attorneys for Defendants
21 CITY AND COUNTY OF SAN FRANCISCO,
22 CHRIS LOGIA, DAN GILMAN, and HERB DANG

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA

25 ANTIA LELAIND,

26 Plaintiff,

27 vs.

28 CITY AND COUNTY OF SAN
FRANCISCO; PUBLIC UTILITIES
COMMISSION; DAN GILMAN, in his
individual and official capacities; CHRIS
LOGIA, in his individual and official
capacities; HERB DANG, in his individual
and official capacities; and DOES 1
THROUGH 50,

Defendants.

Case No. C06-05870 MHP

**STIPULATION EXTENDING
DEADLINE TO COMPLETE
DISCLOSURES AND OTHER
DISCOVERY AND ~~PROPOSED~~
ORDER**

1 Pursuant to Civil L.R. 6-2, Plaintiff ANTIA LELAIN and Defendants CITY AND
2 COUNTY OF SAN FRANCISCO, PUBLIC UTILITIES COMMISSION, CHRIS LOGIA,
3 DAN GILMAN, and HERB DANG hereby stipulate as follows:

4 WHEREAS, Defendants filed a motion for summary judgment on December 3, 2007;
5
6 and

7 WHEREAS, Plaintiff is currently in the process of preparing her opposition to the
8 motion;

9 WHEREAS, following the hearing on Plaintiff's discovery motion on October 29,
10 2007, the Court ordered a further deposition of Plaintiff to determine any relationship
11 between the events during 2005 and the events occurring during the entire term of her
12 employment;
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14 WHEREAS, due to the November 7, 2007 passing of her mother, Plaintiff's counsel
15 was traveling and out of the office for approximately three weeks in November; and
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17 WHEREAS, Plaintiff's counsel's unavoidable absence from her office resulted in a
18 significant work backlog;

19 WHEREAS, in part due to Plaintiff's counsel's unavailability in November and in part
20 due to the physician's schedule in early December, Plaintiff could not be scheduled for a Rule
21 35 examination until December 13, 2007; and
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23 WHEREAS, the current scheduling order sets forth the following deadlines:

- | | | | |
|----|-----|---|--------------|
| 24 | (1) | Lay witness disclosures for case-in chief | 12/15/07 |
| 25 | (2) | Expert Disclosures | 12/17/07 |
| 26 | (3) | Expert Discovery Cut-Off | 1/21/08; and |

1 WHEREAS, there have been two previous time modifications to extend the deadlines
2 for early ADR and dispositive motions in this case; and

3 WHEREAS, the proposed extension of time will not alter any other deadlines
4 previously set by the Court in this case.
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6 **NOW, THEREFORE, IT IS HEREBY STIUPLATED AND AGREED AS**
7 **FOLLOWS:**

8 1. Pursuant to Federal Rules of Civil Procedure, Rule 16 and pursuant to Local
9 Rules, the foregoing constitutes the requisite good cause to request modification of the Case
10 Scheduling Order;
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12 2. The Parties propose that the trial and pretrial schedule remain the same, but that
13 the following modifications be made to the current Case Scheduling Order:

- | | | | |
|----|-----|---------------------------------|----------|
| 14 | (1) | Lay witness disclosures Cut-Off | 12/22/07 |
| 15 | (2) | Expert Disclosures Cut-Off | 1/11/08 |
| 16 | (3) | Expert Discovery Cut-Off | 2/5/08 |

17 IT IS SO STIPULATED.
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1 Dated: December 14, 2007

MOORE & MOORE

2
3 _____/s/
4 FANIA E. DAVIS, ESQ.

5 Attorney for Plaintiff
6 ANTIA LELAIND

7 Dated: December 14, 2007

DENNIS J. HERRERA
City Attorney
ELIZABETH S. SALVESON
Chief Labor Attorney

10
11 By: _____/s/
12 RAFAL OFIERSKI
13 Deputy City Attorney
14 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
CHRIS LOGIA, DAN GILMAN, and HERB DANG

15 **~~PROPOSED~~ ORDER**

16 BASED ON THE ABOVE STIPULATION and for good cause,
17 **IT IS SO ORDERED.**

18 Dated: 12/19/2007 _____

19 By _____
20 HONORABLE MARILYN H. PATEL
21 United States District Court
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